

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA) CRIMINAL No.: 8:20-cr-00452-DCC
)
)
VS.)
)
JOHN TOWERY,) **UNOPPOSED MOTION TO MODIFY**
) **CONDITONS OF SUPERVISED RELEASE**
Defendant.)
)
_____)

NOW COMES the Defendant, John Towery, by and through his undersigned counsel, does hereby respectfully move for an Order modifying certain conditions of his supervised release in the above case, specifically to remove the GPS electronic monitoring condition.

Defendant was sentenced on February 8, 2022 in Spartanburg, South Carolina, by the Honorable Donald S. Coggins, Jr., Defendant is currently on GPS location monitoring. Since being placed on electronic monitoring, the Defendant has fully complied with all the terms and conditions of his bond and has been on good behavior with no violations.

The defendant's medical condition has recently taken a turn for the worse. He was originally scheduled to have an MRI conducted at Prisma Health in Greenville, South Carolina, towards the end of the month (see Exhibit "A") but due to new complications he was recently admitted as a patient in Oconee Memorial Hospital. His doctor at Oconee Memorial Hospital has determined that it is medically necessary to obtain an MRI and that the GPS ankle monitor needs to be removed to perform the procedure. Furthermore, he needs the assistance of a wheelchair for mobility.

The undersigned has consulted with both Carrie Fisher, Assistant United States Attorney, and Jenna Sandefur, United States Probation Office for the District of South Carolina, and they have both indicated they do not oppose this motion.

For the foregoing reasons, John Towery would respectfully request that the condition of electronic monitoring be removed from the terms of his supervised release and that United States Probation Office be allowed to remove GPS electronic monitoring and the leg/ankle bracelet.

Respectfully submitted,

RAME CAMPBELL LAW FIRM, LLC

s/ Rame L. Campbell

Rame L. Campbell (Fed. Bar # 7737)

106 Cater Street

P.O. Box 2005

Anderson, SC 29622

Ph: (864) 712-9636 Fax: (864) 712-9637

Email: ramecampbelllaw@gmail.com

ATTORNEY FOR DEFENDANT JOHN TOWERY

May 8, 2023